

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR17-322 RAJ

RENE BORROEL-LOPEZ,
Defendant.

PROTECTIVE ORDER

This matter having come before the Court on a Stipulated Motion for Entry of a Discovery Protective Order, the Court hereby enters the following:

DISCOVERY PROTECTIVE ORDER

A. Definitions

As used in this Order, the term “Protected Information” means any contents or data extracted from the cellular telephone seized by DEA from Ronnie Cruickshank (RC) on December 11, 2017, *except for* communications between RC and either (1) the undercover DEA task force officer involved in this matter, or (2) any of the numbers RC identified to law enforcement as belonging to his source of supply (as detailed at RBL_000071, paragraph 3), which the government alleges to be Rene Borroel-Lopez..

1 As used in this Order, the term “Protected Material” means any document or other
2 record containing or reflecting Protected Information.

3 **B. Procedures**

4 Possession of Protected Information and/or Protected Material is hereby limited to
5 the attorneys of record in the above captioned case and their investigators and agents. The
6 attorneys of record and their investigators and agents may not provide Protected
7 Information and/or Protected Material to the defendant, nor review Protected Information
8 and/or Protected Material with the defendant, without either the agreement of the United
9 States Attorney’s Office for the Western District of Washington, or an Order of the
10 Court.

11 The attorneys of record and their investigators and agents may review or discuss
12 the contents of documents containing Protected Material with any prospective witness, as
13 long as the attorneys of record and investigators and agents do not share the unredacted
14 documents, or share any Protected Information of victims or witnesses, with any
15 prospective witness, unless an agreement is reached with the United States Attorney’s
16 Office for the Western District of Washington, or otherwise by an Order of the Court.

17 If any Protected Information or Protected Material is filed in court or otherwise
18 disseminated as part of litigation, the parties agree to redact such information prior to
19 filing; unless, based on a party’s application prior to filing, the Court finds that an
20 unredacted filing is necessary and appropriate.

21 For redactions, numbers that constitute Protected Information shall be redacted to
22 the last 2-4 digits and names shall be redacted to initials, or otherwise as needed to
23 comply with applicable federal and local rules.

24 The attorneys of record and their investigators and agents shall keep any Protected
25 Material secured whenever the Protected Material is not being used in furtherance of their
26 work in the above-captioned case.

27 All documents containing Protected Material shall be returned to the
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1 United States, or destroyed, once all charges are resolved by dismissal or by final
2 conviction.

3 The parties agree that this Protective Order may be modified, as necessary, by
4 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order
5 of the Court.

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7 DATED this 28th day of February, 2018.
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12 The Honorable Richard A. Jones
13 United States District Judge
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